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March 22, 2024

**VIA CM/ECF**

The Honorable José R. Almonte, USMJ  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
Court Room PO 9  
50 Walnut Street  
Newark, New Jersey 07101

**Re: LORENZO v. THE BOROUGH OF PALISADES PARK, NEW  
JERSEY et al.  
Civil Action No.: 2:23-cv-21849-CCC-JRA**

Dear Judge Almonte:

This office represents plaintiff, David Lorenzo, in the above matter.

We have conferred with defendant's counsel and submit the attached, proposed joint discovery plan in connection with the initial scheduling conference scheduled for March 25, 2024.

Thank you.

Respectfully,  
s/ Leonard E. Seaman  
LEONARD E. SEAMAN

LES/me  
Enc.

cc: R. Scott Fahrney , Jr., Esq. (via CM/ECF)  
client (via e-mail)